To: Lifland, David[Lifland.David@epa.gov]

Cc: Schreifels, Jeremy[Schreifels.Jeremy@epa.gov]; Frushour,

Charles[Frushour.Charles@epa.gov]

From: Jachim, Jenny

Sent: Wed 11/30/2016 8:26:55 PM

Subject: FW: Draft Petition response for Devon and Middletown

RE: Devon Power (ORIS 544) and Middletown Power (ORIS 562) Revised NOx Correlation Petition

Devon Middletown Petition 11MAY16.pdf

<u>Draft petition response for Devon and Middletown 5-18-16crfv3.docx</u>

David,

As per Charlie's request, I have modified the draft Devon and Middleton petition response. The new version is "v3" (attached). So as to be consistent with the Dominion petition response, I have simply added the language that Charlie had highlighted in his earlier e-mail.

The change was made in redline.

Please let me know if you have any questions regarding this change.

Thank you,

Jenny

From: Jachim, Jenny

Sent: Wednesday, May 18, 2016 2:57 PM **To:** Lifland, David <Lifland.David@epa.gov>

Cc: Frushour, Charles <frushour.charles@epa.gov>; Schreifels, Jeremy

<schreifels.jeremy@epa.gov>

Subject: FW: Draft Petition response for Devon and Middletown

David,

| My apologies – I made a small change in the version that Charlie sent earlier. Please review the Draft that is "v2" attached to this e-mail |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Thank you, |
| Jenny |
| From: Frushour, Charles Sent: Wednesday, May 18, 2016 2:34 PM To: Lifland, David < Lifland. David@epa.gov > Cc: Jachim, Jenny < Jachim.Jenny@epa.gov >; Schreifels, Jeremy < Schreifels. Jeremy@epa.gov > Subject: Draft Petition response for Devon and Middletown |
| David, |
| Please find attached a draft petition response for the NRG Devon and Middletown stations. The petition is requesting relief from the number of traverse points necessary to conduct Appendix E NOx correlation curve testing. The response is consistent with the draft P75 revisions that we would like to propose. Sources have been requesting relief for quite some time now because of the time it takes to conduct an initial or retest of the correlation curve that requires 3 runs of 12 sample points at four loads per fuel. This draft response allows for a reduced number of sample points at each load level "if" the results of stratification testing indicate the exhaust gases are not stratified and one or three traverse points is sufficient. |
| If you have any questions or need further information please let me know. |
| Charlie |

Charles R. Frushour III

USEPA Clean Air Markets Division

Emissions Monitoring Branch

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